

### **REMARKS**

This amendment is submitted in response to the Office Action of April 7, 2005 and totally replaces the amendment of July 7, 2005. The amendment of July 7, 2005, which was identical to the January 7, 2005 amendment, was inadvertently submitted. The current amendment have been submitted. The undersigned apologies to the Examiner for this error.

The undersigned discussed the above matter with the Examiner on August 1, 2005 and further discussed the substance of the deficiencies of Kurzweil as discussed on pages 14-16 herein. The Examiner is thanked for the courtesy of discussing the enclosed amendment on August 1, 2005.

The present invention is an electronic device, a hand-held radio communications device, a document reader, a car and a method for displaying text and providing speech synthesis of the text. An electronic device in accordance with an embodiment of the invention includes a user interface including a display 4, a speech synthesizer 16 including a loudspeaker which converts an input, dependent upon a text, to an audio output representative of a person reading the text; and a control 14, for controlling the display and for providing an input to the speech synthesizer, which controls the display of text, to provide an input corresponding to the displayed text to the speech synthesizer, and to highlight a portion or portions of the displayed text, wherein initiation of the highlighting of a text portion is delayed with respect to the audio output corresponding to the text portion. Figs. 3-7 and paragraphs [0043] - [0059] describe initiation of highlighting of portions of a body of text which is delayed relative to the audio output from the speaker 6. Delaying of highlighting is performed by the controller

as described in paragraph [0039].

The initiation of delaying of highlighting relative to the output of synthesized speech has distinct benefits. See paragraphs [0007] and [0008] of the Substitute Specification, wherein it is discussed that checking for mispronunciation is facilitated and furthermore, when a user is multitasking while listening to synthesized speech, the user is directed to the relevant portion of text with a minimum of distraction without having to scan the entire text.

Claim 30 stands objected to regarding the absence of a period. Claim 30 has been amended to add a period at the end thereof as requested by the Examiner.

Claims 1-4, 8, 10, 12, 20, 25-27, 30-32 and 35 stand rejected under 35 U.S.C. 103 as being anticipated by U.S. Patent 5,875,428 (Kurzweil, et al.). These grounds of objection are traversed for the following reasons.

With respect to claim 1, the Examiner construes Kurzweil, et al. in column 5, lines 54-55 and 66-67 through column 1, lines 1-6 to disclose highlighting of a text portion which is delayed with respect to the audio output. This conclusion is erroneous for the following reasons. The beginning of the paragraph at Column 5, lines 49-51 make reference to Fig. 3 which clearly, has been discussed in applicant's previous responses as teaching applying highlighting at step 48 and thereafter speech synthesis at step 52. However, immediately after the first sentence the statement is made "[p]rior techniques for providing highlighting which simply highlight a line or paragraph in the text presentation displayed on the monitor... highlighting would be of the current word is being read aloud to the user". This reference is with respect to the prior art and is not with respect with the disclosure of Fig. 3. It is not proper for the Examiner to allege

anticipation based on the cited portions of Kurzweil, et al. since the paragraph beginning at column 5, lines 49-51 describes two different systems which are (1) prior art to Kurzweil, et al. and (2) the invention of Kurzweil, et al. which systems are incompatible and therefore can not be an anticipation. A person of ordinary skill in the art would not consider the reference to the prior art technique to be relevant to the operation of Fig. 3.

Independent claims 1, 26, 27, 28 and 31 recite highlighting a portion or portions of displayed text "wherein initiation of the highlighting of a text portion" is delayed by control means with respect to the audio output corresponding to the text portion. In this regard claims 1, 26 and 27 respectively recite "[a]n electronic device comprising...; "[a] hand-held radio communications device comprising. ....;" and [a] document reader comprising a user interface... each of which recite "control means for controlling the display and for providing an input to the speech synthesizer means, to provide an input corresponding to the displayed text to the speech synthesizer, and to highlight a portion of portions of the displayed text, wherein initiation of the highlighting of a text portion is delayed by the control means with respect to the audio output corresponding to the text portion" and claim 28 recites "[a] car or a document reader comprising...control means for controlling the display and for providing an input to the speech synthesizer means, arranged to control the display of a text, to provide an input corresponding to the displayed text to the speech synthesizer, and to highlight a portion or portions of the displayed text, wherein initiation of the highlighting of the text portion is delayed by the control means with respect to the audio output corresponding to a text portion".

Claim 30 recites "[a] method for displaying text and providing speech synthesis of the text comprises the steps of:...determining that the text portion should be highlighted;

delaying and then highlighting the text portion."; claim 31 recites "[a]n electronic device comprising: ...control means, for controlling the display and providing an input to the speech synthesizer means, arranged to control the display of the text, to provide an input corresponding to the display text to the speech synthesizer means; and to delay the initiation of the display of a text portion with respect to the audio output corresponding to the text portion; and claim 32 recites "[a] method for displaying text and providing speech synthesis of the text comprising the steps of: converting a text portion to audio output; delaying and then displaying a text."

Finally, new claim 40 recites a "computer program executable in a processor of an electronic device..." control means, for controlling the display and for providing an input to the speech synthesizer means, which controls the display of a text, to provide an input corresponding to the displayed text to the speech synthesizer, and to highlight a portion or portions of the displayed text, wherein an initiation of the highlighting of a text portion is delayed by the control means with respect to the audio output corresponding to the text portion". Support for claim 40 is found in paragraphs [0033], [0037] and [0039].

It is therefor seen that each of the independent claims in various degrees of scope in substance recites initiation of the highlighting of display of the text portion which is delayed with respect to the audio output corresponding to the text portion which has not counterpart in Kurzweil, et al. With the claimed invention, the delaying of display of highlighting by the control means is after initiation of speech synthesis which is the situation where either speech synthesis has started but has not ended or speech syntheses has been completed ended whereas in Kurzweil, et al. the highlighting

activity of word at step 48 is always initiated before speech synthesis at step 52 has started.

Dependent claims 2-4, 8, 10, 12, 25 and 35 define more specific aspects of the present invention which are not anticipated by Kurzweil, et al.

Claims 5-7, 9, 11, 13, 16-19, 21-24, 28, 33-34 and 36-39 stand rejected under 35 U.S.C.103 as being unpatentable over Kurzweil, et al. These grounds of rejection are traversed for the following reasons:

The deficiencies of Kurzweil, et al. have been pointed above with regard to the fundamentally different operation of the applying of highlighting at step 48 before speech synthesis at step 52 which is repeated herein by reference.

It is noted that with respect to the rejected claims that the Examiner is relying upon mere conclusion, without the citation of prior art, to justify the Examiner's conclusion with respect to obviousness. It is submitted that the Examiner has not demonstrated a *prima facie* case of obviousness given that the only basis for rejection is the unsubstantiated opinion of the Examiner which extends from page 9 of the Office Action to a conclusion at the bottom of page 19. Withdrawal of these unsubstantiated grounds of rejection is respectfully requested. If the Examiner persists in the stated grounds of rejection, it is requested that the Examiner reply upon and make of record prior art which the Examiner considers to justify his conclusions.

Claims 14 and 15 stand rejected under 35 U.S.C. 103 as being unpatentable but Kurzweil, et al. in view of U.S. Patent 5,065,345 (Knowles, et al.). Knowles et al. has been cited as teaching highlighting of words that are not present in a dictionary. However, the citation of Knowles, et al. does not cure the deficiencies noted above with

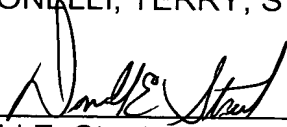
respect to Kurzweil.

In view of the foregoing amendments and remarks, it is submitted that each of the claims in the application is in condition for allowance. Accordingly, early allowance thereof is respectfully requested.

To the extent necessary, Applicants petition for an extension of time under 37 C.F.R. § 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 01-2135 (1302.39020X00) and please credit any excess fees to such Deposit Account.

Respectfully submitted,

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